UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

AVILA FLORES, Reyna Isabel

Plaintiff,

v.

Civ. No: 1:15-cv-1415-TSE-TCB

RABABEH, Kheder

Defendant

Renewed Motion for Default Judgment Against Defendant Kheder Rababeh

On March 1, Plaintiff moved for default judgment in this case (ECF No. 15). Following the Court's March 18 default-judgment hearing, the Magistrate Judge ordered Defendant Kheder Rababeh to respond to Plaintiff's amended complaint by April 8, 2016. (ECF No. 19). He has not done so. Accordingly, Plaintiff renews her motion for default judgment against him.

Plaintiff rests on the brief she submitted in support of her original motion (ECF No. 16), but lowers the amount she seeks in judgment by \$3,000 to reflect payments made in satisfaction thereof by Imad Rababeh, who is no longer a party to this case (ECF No. 24).

Plaintiff respectfully submits that this motion is appropriate for decision without a hearing, as Defendant Kheder Rababeh has not responded to the Complaint or the Amended Complaint, did not appear for the March 18 default-judgment hearing, and did not take advantage of the extra three weeks that the Court gave him to respond after that hearing.

WHEREFORE, Plaintiff respectfully asks that the Court enter a default judgment against Defendant Kheder Rababeh in the amount of \$43,791.90, plus attorney's fees and any other relief the Court deems just and proper.

Date: May 3, 2016

Respectfully submitted,

LEGAL AID JUSTICE CENTER

By: //s// Nicholas Cooper Marritz
Nicholas Cooper Marritz (VSB No. 89795)
Simon Y. Sandoval-Moshenberg (VSB No. 77110)
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: (703) 778-3450 x 607

Fax: (703) 778-3454 nicholas@justice4all.org Counsel for plaintiff

Certificate of Service

Date: May 3, 2016

I hereby certify that I uploaded this document to the Court's CM/ECF system today, May 3, 2016, causing a notice of electronic filing to be sent to all counsel of record.

I also sent a copy to the following non-CM/ECF participants today by U.S. Mail:

Kheder Rababeh 5006 Terrell St. Annandale, VA 22003

Michael Hadeed, Jr Hadeed Law Group, P.C. 510 King Street, Suite 400 Alexandria, VA 22314 Tel: 703.962.7452

Fax: 703.962.7473

michael@hadeedlaw.com Counsel for Imad Rababeh

//s// Nicholas Cooper Marritz

Nicholas Cooper Marritz (VSB No. 89795) Simon Y. Sandoval-Moshenberg (VSB No. 77110) LEGAL AID JUSTICE CENTER 6066 Leesburg Pike, Suite 520

Falls Church, VA 22041 Tel: (703) 778-3450 x 607

Fax: (703) 778-3454 nicholas@justice4all.org Counsel for plaintiff